

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
READING DIVISION**

IN RE:)	
)	CASE NO. 19-13862-PMM
CONSTANCE FAYE SALANECK)	CHAPTER 13
DEBTOR)	
)	

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING
PROPERTY DESCRIBED AS 556 FIRE TOWER ROAD, BIRDSBORO, PA 19508 AND
THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN NUMBER
*****0756**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a secured creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Andrew Spivack
Brock and Scott, PLLC
Attorneys at Law
302 Fellowship Road, Suite 130
Mount Laurel, NJ 08054
PABKR@brockandscott.com

Freedom Mortgage
10500 Kincaid Drive
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

21-00527 BKOBJ01



Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Andrew Spivack

Andrew Spivack
Attorney at Law (84439)
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302 Fellowship Road, Suite 130
Mount Laurel, NJ 08054
844-856-6646 x3017
704-369-0760
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice of Appearance has been electronically served or mailed, postage prepaid on January 27, 2021 to the following:

Constance Faye Salaneck
556 Fire Tower Road
Birdsboro, PA 19508

Law Office of Michele Perez Capilato
500 Office Center Drive
Suite 400
Fort Washington, PA 19034
perezcapilatolaw@yahoo.com

Scott F. Waterman, Bankruptcy Trustee
Chapter 13 Trustee
2901 St. Lawrence Ave, Suite 100
Reading, PA 19606

/s/ Andrew Spivack
Andrew Spivack
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